

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

2024 OCT 15 AM 11:04

In re:

FTX TRADING LTD., *et al.*,

Debtors.

Chapter 11

Case No. 22-11068 (JTD)

(Jointly Administered)

Hearing Date: October 22, 2024 at 1:00 P.M. ET

Objection Deadline: October 14, 2024 at 4:00 P.M. ET

**CLAIMANT 79764'S OPPOSITION TO DEBTORS' SEVENTY-THIRD
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
CLAIMS FILED AGAISNT ALLEGED INCORRECT DEBTOR**

Claimant Rubyann Willis has filed claim number 79764 for
\$14,913.63 as reimbursement for money paid to FTX for fraudulent investments.

Factual Basis for Claim

1. On November 11, 2022, I made a request to withdraw 7.60000000 ETH from my FTX US account to my external Exodus wallet. I received an email notifying me that FTX received the request, stating the ETH address and that withdrawals are processed within a few hours. (See Ex.1 [Email confirmation of 11/11/22 withdrawal, including ETH address]). FTX withdrew the Ethereum from my account but never sent or deposited it into my Exodus account. (see Ex. 2 [Image of my account history for FTX showing the ETH was taken out]. See Ex. 3 [Image of Exodus account showing the FTX deposit of ETH was never delivered]. See Ex. 4 [Image showing the address FTX stated it would deposit the ETH into]. See Ex. 5 [Image of Exodus wallet ETH address]). These examples show that my account addresses for ETH match and it was not a mistake on my part but rather FTX never sent the ETH. They just made it disappear on the day they shut down the entire platform, freezing all account holders access to funds/crypto. I emailed Exodus asking where my ETH deposit was and they replied with an email stating that it is not on their side and that FTX is withholding my deposit. (see Ex. 6 [exodus email]). I have also sent many emails to FTX, none of which they have replied to.

2. On March 30, 2023 I received an email from FTX stating my net positive account balance. This balance includes the ETH that was never deposited into my Exodus wallet. This email states that they have a record of the ETH, it is in my net positive balance and that they intend to credit me. However, FTX is now attempting to remove this amount from my claim, even though they have already admitted they are indebted to me for it. (See Ex. 7 (email from FTX with net positive account balances)).

Legal Basis for Claim

Global Settlement Agreement (GSA). Case 22-11068-JTD

Conclusion

WHEREFORE, Claimant Rubyann Willis respectfully requests that the Court deny Debtors' Seventy-third Omnibus Objection to her claim.

Dated: October 7, 2024



Rubyann Willis

FTX Trading Ltd. 22-11068 (JTD)
Seventy-Third Omnibus Claims Objection
Schedule 1 - Incorrect Debtor Claims

Claim Number		Name		<u>Asserted Claims</u>	<u>Modified Claims</u>
				Debtor	Debtor
79764		Willis, Rubyann		FTX Trading Ltd.	West Realm Shires Services Inc.

DECLARATION OF SERVICE

Case Name: *In re FTX TRADING LTD., et al.* Chapter 11 Case No. 22-11068

I, the undersigned, declare as follows:

I am a citizen of the United States, over the age of 18 years and not a party to the within action; my address is P.O. Box 348 Tuolumne, CA 95379.

On October 7, 2024, I served the attached

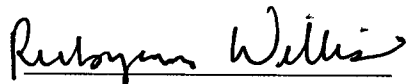
**CLAIMAINT 79764'S OPPOSITION TO DEBTORS' SEVENTY-THIRD
(NON-SUBSTANTIVE) OMNIBUS OBJECTION TO CERTAIN
CLAIMS FILED AGAISNT ALLEGED INCORRECT DEBTOR**

by placing a true copy thereof in an envelope addressed to the person(s) named below at the address(es) shown, and by sealing and depositing the envelope in the United States Mail at Mammoth Lakes, California, with postage thereon fully prepaid.

Matthew R. Pierce Landis, Rath & Cobb, LLP 919 Market Street, Suite 1800 Wilmington, DE 19801	Sullivan & Cromwell, LLP 125 Broad Street New York, NY 10004

I declare under penalty of perjury under the laws of the State of California and the United States the foregoing is true and correct and that this declaration was executed on October 7, 2024, at Mammoth Lakes, California.

Rubyann Willis
Declarant


Signature

From: FTX US <support@ftx.us>
Subject: ETH withdrawal request
Date: November 11, 2022 at 6:28:53 PM PST
To: rubyannwillis@gmail.com

Hello rubyannwillis@gmail.com,

We have received a request to withdraw 7.60000000 ETH from your FTX US account to [REDACTED]

If you did not make this request, please change your password and contact customer support immediately.

Withdrawals are processed within a few hours. You can find more information at <https://help.ftx.us/hc/en-us/articles/360047164493-Account-Funding-Options>.



Ethereum

\$1,735.14

1.3516 ETH

APY ⓘ

8.00 %

Total earned ⓘ

0.34122037 ETH

Recurring orders History

Withdraw

Nov 11, 2022

-7.6 ETH

Withdraw

Nov 10, 2022

-7.7 ETH

Deposit

Aug 4, 2022

1.4368 ETH

DEPOSIT

SEND



2:25 PM

\$384.11

tx3



Fee to send MANA

0.004493

2:24 PM

\$10.54

December 27, 2023



Swapped from SOL

+0.363586

7:22 PM

\$852.56

January 8, 2023



Sent

7.6

3:41 PM

\$9,765.31

November 10, 2022



Received

+7.6995

9:32 PM

\$9,924.32



Ethereum

\$1,735.14



Withdraw ETH

Initiated:

Nov 11, 2022 6:28 PM

To:



Withdraw

11/11/2022

-7.7 ETH

Deposit

11/11/2022

1.4368 ETH

DEPOSIT

SEND

tx 5



Your Ethereum Address



Receive ETH, tokens, and NFTs on Ethereum and
Ethereum-compatible networks only

Share

From: Leonard Bowlin <leonardbowliniii@gmail.com>
Subject: Fwd: Did not receive eth transfer
Date: November 28, 2022 at 2:30:28 PM PST
To: rubyannwillis@gmail.com

----- Forwarded message -----

From: **Victor L** <support@exodus.com>
Date: Sun, Nov 27, 2022 at 10:34 PM
Subject: Re: Did not receive eth transfer
To: Leonard <leonardbowliniii@gmail.com>

Hello Leonard,

Thank you for reaching out to Exodus support today.

I am so sorry to hear that you have funds held on FTX and that these are not available for you to access. I can only imagine how worrying this entire situation must be for you.

Please allow me to attempt to shed some light on everything that is happening.

With regards to any assets you hold in your Exodus wallet, please rest assured knowing your funds are safe.

Your current ETH balance in your Exodus wallet should be 7.6995 ETH:

[REDACTED]

No one at Exodus can freeze or take control of your assets. Let me explain in detail.

Now, the Exodus wallet did offer integration with FTX. This was intended to serve as a link between a custodial exchange and the wallet interface to assist our users when moving between the different platforms.

The addresses in your FTX portfolio are not linked to your Exodus wallet's [REDACTED]. As stated above, this is because FTX is a custodial exchange; therefore you will not have access to the private keys associated with the public addresses in your FTX portfolio.

Unfortunately, Exodus does not have any control over the operation and functioning of FTX. FTX offered a straightforward option for users of the Exodus wallet to move funds from the wallet to a custodial exchange to then either trade the assets or sell the assets to send fiat to a bank account.

Due to this, I am afraid that these funds are held by FTX and only FTX has access to them.

wrote:

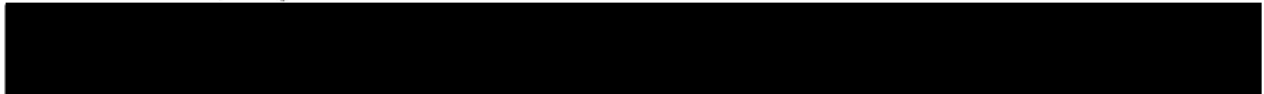
hello, yes that is my exodus wallet address. however, this transaction has yet to appear into my wallet. i have already refreshed my wallet and it is still missing. thank you

On Sat, Nov 26, 2022 at 10:21 PM UTC, Phil W <support@exodus.com> wrote:
Hi Leonard,

Thank you for getting back to us. Please allow me to step in for Andrew as he's currently offline.

First, to clarify, the ETH address you provided us is that of your Exodus wallet, correct? Or did I misunderstand and it is your FTX ETH address?

If it is your Exodus ETH address we can see a successful transfer of 7.6995 ETH made 15 days ago in this transaction:



Is this the transaction in question, Leonard? If so, and you do not see the funds in your Exodus wallet, can you please refresh for me?

- [How to refresh your mobile wallet](#)

This will ensure that your wallet is up to date with the blockchain and is displaying the most accurate information.

If this is *not* the transaction in question, then a transaction hash from FTX would help us to determine the status.

Finally, if the address is correct and the refresh didn't help, can you please send us your Safe Report?

- [How do I export my Safe Report from Exodus Desktop?](#)

Your Safe Report will give me a view-only version of your wallet, so I can check for any errors and completely diagnose your issue.

We will be standing by for your reply, and please let us know if you'd like any clarity or have any questions whatsoever—we're always here to help.

Cheers,
Phil

within Exodus:

- How do I refresh my wallet?

Let's start there. I'll keep an eye out for your reply. My inbox is open 24/7.

Kind regards,
Andrew



Keep in touch: [Exodus.com](#) | [Status](#) - [Knowledge](#) - [Twitter](#) |
[Secure your Wealth](#)

On Sat, Nov 26, 2022 at 8:25 PM UTC, Leonard <leonardbowliniii@gmail.com> wrote:

I sent ETH from my FTX wallet to my Exodus wallet and received a address which is still show the amount i sent yet neither one of my wallets has the ETH



Ruby Willis <rubyannwillis@gmail.com>

FTX - Your Scheduled Claim Information and Unique Customer Code

FTX Noticing <ftx@noticing.ra.kroll.com>

Thu, Mar 30, 2023 at 11:27 AM

Reply-To: <ftxnoticing@kroll.com>

To: <rubyannwillis@gmail.com>

YOUR UNIQUE CUSTOMER CODE(S) AND SCHEDULED CLAIM INFORMATION IS AT THE BOTTOM OF THIS EMAIL.

YOU ARE RECEIVING THIS EMAIL BECAUSE YOU HAVE BEEN IDENTIFIED AS A CUSTOMER WITH A NET POSITIVE ACCOUNT BALANCE AS OF NOVEMBER 11, 2022 OF ONE OR MORE OF THE DEBTORS IN THE CHAPTER 11 CASES OF FTX TRADING LTD. AND CERTAIN OF ITS AFFILIATED DEBTORS AND DEBTORS-IN-POSSESSION PENDING IN THE UNITED STATES BANKRUPTCY COURT FOR THE DISTRICT OF DELAWARE AND JOINTLY ADMINISTERED UNDER THE CASE NUMBER 22-11068. YOU HAVE BEEN LISTED IN ONE OR MORE OF THE DEBTORS' SCHEDULES AND STATEMENTS.

On March 14 and 15, 2023, the FTX Trading Ltd. and certain of its affiliated debtors and debtors-in-possession (collectively, the "Debtors") filed their schedules of assets and liabilities and statements of financial affairs (the "Schedules and Statements").

Pursuant to the Final Order (I) Authorizing the Debtors to Maintain a Consolidated List of Creditors in Lieu of Submitting a Separate Matrix for Each Debtor, (II) Authorizing the Debtors to Redact or Withhold Certain Confidential Information of Customers and Personal Information of Individuals on a Final Basis and (III) Granting Certain Related Relief [D.I. 545], customer names and addresses in the Schedules and Statements are redacted. With respect to Schedules E/F – which identify creditors of the Debtors with non-priority unsecured claims (including customers with a net positive account balance as of November 11, 2022) – in an effort to redact customer names and addresses, the Debtors have identified each customer with a net positive account balance as of November 11, 2022 by a [REDACTED]

[REDACTED] your Unique Customer Code and an excerpt of your scheduled claim(s) are at [REDACTED]

PLEASE BE ADVISED THAT THE COURT HAS NOT YET SET A DEADLINE FOR SUBMITTING PROOFS OF CLAIMS OR INTERESTS AGAINST THE DEBTORS. WHEN THE COURT SETS A DEADLINE, ALL KNOWN CREDITORS, INCLUDING ALL CUSTOMERS IDENTIFIED ON THE SCHEDULES AND STATEMENTS, WILL BE PROVIDED NOTICE OF THE DEADLINE AND INSTRUCTIONS ON HOW TO SUBMIT PROOFS OF CLAIM OR INTERESTS.



Retail

US POSTAGE PAID

\$10.45

Origin: 93546
10/08/24
0547040546-07

PRIORITY MAIL®

0 Lb 3.50 Oz

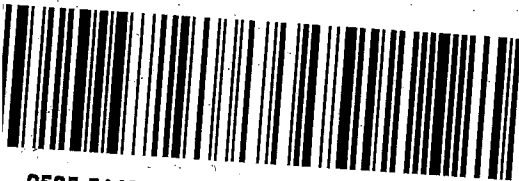
RDC 03

ED DELIVERY DAY: 10/11/24

C012

24 N MARKET ST
WILMINGTON DE 19801-3024

USPS TRACKING® #



9505 5140 6365 4282 2231 89



Package Pickup,
QR code.



PM/PICKUP



EP14F October 2023
OD: 12 1/2 x 9 1/2

Y TO SEAL

TY®

PRIORITY MAIL
FLAT RATE ENVELOPE
POSTAGE REQUIRED

FROM:

R. Willis
P.O. Box 348
Tulumne, CA
95379

destinations.

verage.

TO:

U.S. Bankruptcy Court
District of Delaware
office of the clerk
824 Market Street
3rd floor
Wilmington, DE
19801